

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
January 2016 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.

WONG HUNG NG (6),
aka "Mau,"
GILBERTO GERARDO
VILLALOBOS ZAMORA (7),
aka "Lic,"

Case No. 16CR1996-WQH

I N D I C T M E N T
(3rd Superseding)

Title 21, U.S.C., Secs. 959, 960 and 963 - International Conspiracy to Distribute Controlled Substances; Title 21, U.S.C., Secs. 959 and 960 - International Distribution of Controlled Substances; Title 21, U.S.C., Secs. 841(a)(1) and 846 - Conspiracy to Distribute Controlled Substances; Title 18, U.S.C., Secs. 1956(a)(1)(B)(i), (a)(2)(B)(i) and (h) - Conspiracy to Launder Monetary Instruments; Title 21, U.S.C., Sec. 853 and Title 18, U.S.C., Sec. 982 - Criminal Forfeiture



Defendants.

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including May 2017, in the countries of Mexico, Costa Rica, Nicaragua and elsewhere, defendants [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO
4 VILLALOBOS ZAMORA, aka "Lic," [REDACTED]

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED] who will
18 first enter the United States in the Southern District of California,
19 did knowingly and intentionally conspire with each other and with others
20 known and unknown to the grand jury to distribute and cause the
21 distribution of a controlled substance, to wit: 5 kilograms and more of
22 a mixture and substance containing a detectable amount of cocaine, a
23 Schedule II Controlled Substance; intending and knowing that such
24 cocaine would be unlawfully imported into the United States; all in
25 violation of Title 21, United States Code, Sections 959, 960, and 963.

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Count 2

In or about January 2016, in the country of Mexico and elsewhere,
defendants [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] who will first enter the United States in the
Southern District of California, did knowingly and intentionally
distribute and cause the distribution of 5 kilograms and more of a
mixture and substance containing a detectable amount of cocaine, a
Schedule II controlled substance, intending and knowing that such
cocaine would be unlawfully imported into the United States; in violation
of Title 21, United States Code, Sections 959 and 960.

Count 3

In or about March 2016, in the country of Mexico and elsewhere,
defendants [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] who will first enter the United States
in the Southern District of California, did knowingly and intentionally
distribute and cause the distribution of 5 kilograms and more of a
mixture and substance containing a detectable amount of cocaine, a
Schedule II controlled substance, intending and knowing that such
cocaine would be unlawfully imported into the United States; in violation
of Title 21, United States Code, Sections 959 and 960.

Count 4

In or about May 2016, in the country of Nicaragua and elsewhere, defendants [REDACTED] [REDACTED] WONG HUNG NG, aka "Mau," and GILBERTO GERARDO VILLALOBOS ZAMORA, aka "Lic," who will first enter the United States in the Southern District of California, did knowingly and intentionally distribute and cause the distribution of 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending and knowing that such cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959 and 960.

Count 5

Beginning at a date unknown to the grand jury and continuing up to and including May 2017, within the Southern District of California and elsewhere, defendants [REDACTED]

[REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO VILLALOBOS ZAMORA, aka "Lic," [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED] did
5 knowingly and intentionally conspire together and with each other and
6 with others known and unknown to the grand jury to possess with intent
7 to distribute and to distribute a controlled substance, to wit: 5
8 kilograms and more of a mixture and substance containing a detectable
9 amount of cocaine, a Schedule II Controlled Substance; all in violation
10 of Title 21 United States Code, Sections 841(a)(1) and 846.

11 Count 6

12 Beginning at a date unknown to the grand jury and continuing up to
13 and including May 2017, within the Southern District of California and
14 elsewhere, defendants [REDACTED]
15 [REDACTED]
16 [REDACTED]

17 [REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO
18 VILLALOBOS ZAMORA, aka "Lic," [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 [REDACTED] did
24 knowingly combine, conspire, and agree with each other and with other
25 persons known and unknown to the grand jury to commit offenses against
26 the United States, to wit: to knowingly conduct financial transactions
27 affecting interstate commerce and foreign commerce, which transactions
28 involved the proceeds of specified unlawful activity, that is,

1 Conspiracy to Possess With Intent to Distribute and to Distribute
2 Controlled Substances in violation of Title 21, United States Code,
3 Sections 841(a)(1) and 846, knowing that the transactions were designed
4 in whole and in part to conceal and disguise the nature, location,
5 source, ownership, and control of the proceeds of specified unlawful
6 activity, and knowing that the property involved in the financial
7 transactions represented the proceeds of some form of unlawful activity,
8 in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);
9 and to transport, transmit, and transfer, a monetary instrument and
10 funds involving the proceeds of specified unlawful activity, that is,
11 Conspiracy to Possess With Intent to Distribute and to Distribute
12 Controlled Substances in violation of Title 21, United States Code,
13 Sections 841(a)(1) and 846, from a place in the United States to and
14 through a place outside the United States, knowing that the funds
15 involved in the transportation, transmission, and transfer represented
16 the proceeds of some form of unlawful activity and knowing that such
17 transportation, transmission, and transfer was designed in whole and in
18 part to conceal and disguise the nature, location, source, ownership,
19 and control of the proceeds of specified unlawful activity, in violation
20 of Title 18, United States Code, Section 1956(a)(2)(B)(i); all in
21 violation of Title 18, United States Code, Section 1956(h).

22 Criminal Forfeiture Allegations

23 1. The allegations contained in Counts 1 through 6 are realleged
24 and by their reference fully incorporated herein for the purpose of
25 alleging forfeiture to the United States of America pursuant to the
26 provisions of Title 21, United States Code, Section 853 and Title 18,
27 United States Code, Section 982.

2. As a result of the commission of the felony offenses alleged in Counts 1 through 5 of this indictment, said violations being punishable by imprisonment for more than one year and pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(a)(2), defendants [REDACTED]

[REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO VILLALOBOS ZAMORA, aka "Lic," [REDACTED]

[REDACTED] shall, upon conviction, forfeit to the United States all their rights, title and interest in any and all property constituting, or derived from, any proceeds the Defendants obtained, directly or indirectly, as the result of the offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in this indictment.

3. Upon conviction of the offense set forth in Count 6, defendants

WONG HUNG NG, aka "Mau," GILBERTO GERARDO VILLALOBOS ZAMORA,
aka "Lic,"

shall forfeit to the United States, all property, real and personal, involved in such offense, and all property traceable to such property.

4. If any of the above referenced forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

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1 it is the intent of the United States, pursuant to Title 21, United
2 States Code, Section 853(p), to seek forfeiture of any other property
3 of the defendants up to the value of the said property listed above as
4 being subject to forfeiture.

5 All in violation of Title 21, United States Code, Section 853 and
6 Title 18, United States Code, Section 982.


7 DATED: September 28, 2017.

8 A TRUE BILL:

9
10 
Foreperson

11 ALANA W. ROBINSON
12 Acting United States Attorney

13 By:


14 JOSHUA P. JONES
Assistant U.S. Attorney

I hereby attest and certify on 9/28/17
That the foregoing document is a full, true and correct
copy of the original on file in my office and in my legal
custody.

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

By  Deputy